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Attorneys for Holly M. Mohorcich, Trustee of the Mark Mohorcich Irrevocable Trust

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MONTANA**

IN RE:)
) No. 22-90150
SHERLOCK STORAGE, LLC,) (Chapter 11)
)
 Debtor.)

STIPULATION FOR USE OF CASH COLLATERAL

COME NOW, Sherlock Storage, LLC, Debtor in the above-entitled case, by and through its attorney of record, Gary S. Deschenes, and Holly M. Mohorcich, Trustee of the Mark Mohorcich Irrevocable Trust (“TRUST”), by and through her attorney of record, Martin S. King, and stipulate and agree as follows:

1. Debtor filed this case under Chapter 11 of Title 11 of the United States Code on October 4, 2022.

2. Trust holds a Montana Trust Indenture on Debtor's real property. The Trust is an over-secured creditor.

3. Debtor has the need for the release of the rents, issues, royalties, and profits ("cash collateral") that currently exist. The Trust claims a perfected lien in cash collateral through the recorded Montana Trust Indenture against the real property.

4. The parties agree that the requested release of cash collateral is in the best interest of the estate.

5. At any time, the Trust may file a notice with the Court and mail a copy thereof to counsel for the Debtor and to the Debtor itself at its last known address, giving Debtor forty-five (45) days written notice that the Trust will no longer authorize Debtor to use the Trust's cash collateral. After giving such Notice, a hearing shall be set with the Court on Debtor's continued use of the cash collateral.

6. The Trust shall have a continuing lien on Debtor's real property and the Trust reserves its claim to a lien against all rents and proceeds therefrom including cash collateral.

7. No other persons other than Debtor and the Trust, claim an interest in the cash collateral described in this Stipulation.

WHEREFORE, Debtor and Holly M. Mohorcich, Trustee of the Mark Mohorcich Irrevocable Trust move the Court to approve this Stipulation and to authorize the use of cash collateral as set forth herein

DATED this 21st day of November, 2022.

DESCHENES & ASSOCIATES LAW OFFICES

BY:/s/ Gary S. Deschenes
Gary S. Deschenes
Attorneys for Debtor

WORDEN THANE P.C.

BY:/s/ Martin S. King

Martin S. King

Attorneys for Holly M. Mohorcich, Trustee of the

Mark Mohorcich Irrevocable Trust

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify under penalty of perjury that on the 21st day of November, 2022, a copy of the foregoing was served by electronic means pursuant to LBR 9013-1(d)(2) on the parties noted in the Court's ECF transmission facilities and/or by mail on the following parties:

None.

/s/ Lisa Peck

Lisa Peck